

## MAYER | BROWN

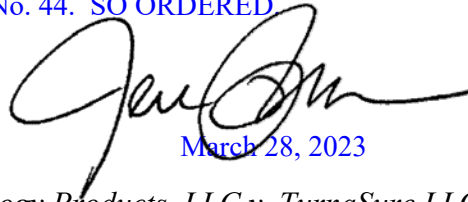
March 27, 2023

Application GRANTED temporarily. That said, mere agreement between the parties to keep a document confidential is not sufficient to keep a “judicial document” sealed or redacted. *See, e.g., United States v. Wells Fargo Bank N.A.*, No. 12-CV-7527 (JMF), 2015 WL 3999074, at \*4 (S.D.N.Y. June 30, 2015) (citing cases). Thus, if Applied Bolting believes that the materials at issue should remain sealed or redacted, it shall file a letter brief, within three days and not to exceed three pages, showing why doing so is consistent with the presumption in favor of public access to judicial documents. *See generally Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 119-20 (2d Cir. 2006).

### Via ECF

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Centre Street, Room 2202  
New York, New York 10007  
(212) 805-0282

The Clerk of Court is directed to terminate ECF  
No. 44. SO ORDERED



March 28, 2023

Re: *Applied Bolting Technology Products, LLC v. TurnaSure LLC*: 1:22-cv-10506 (JMF)

Dear Judge Furman:

We write on behalf of Defendant and Counterclaim-Plaintiff TurnaSure LLC (“TurnaSure”). Pursuant to Section 6 of the Southern District of New York’s Electronic Case Filing Rules and Instructions, Section 7 of Your Honor’s Individual Rules and Practices in Civil Cases, and Standing Order 19-MC-00583, TurnaSure seeks permission to file its Opposition to Plaintiff and Counterclaim-Defendant Applied Bolting Technology Products, LLC’s Motion for a Temporary Restraining Order and Preliminary Injunction (“Opposition”) under seal. Pursuant to the Protective Order entered in this case (ECF No. 35), TurnaSure is contemporaneously filing a public redacted version of the Opposition.

The reason for this request is that certain references contained in the Opposition, and exhibits appended to the Opposition contain materials produced in this litigation by Plaintiff and Counterclaim-Defendant Applied Bolting Technology Products, LLC under confidentiality designations pursuant to the Protective Order. TurnaSure takes no position with respect to whether those materials actually are confidential or warrant their designations.

Respectfully submitted,



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